

## **Internap Connectivity, LLC**

### **STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION**

Set forth below is a statement summarizing the policies and procedures of Internap Connectivity, LLC ("Internap Connectivity") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.2001 *et seq.* Internap Connectivity provides broadband services exclusively to its business customers.

As a broadband services provider, the company does not provide "telecommunications services" and therefore does not have access to CPNI. Internap Connectivity does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of "telecommunications services" as defined under the Communications Act and regulated under Title II, which can be associated with individual customers.

Nevertheless, Internap Connectivity has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI. The company has informed its employees of the company's CPNI compliance policy. Internap Connectivity does not release or distribute CPNI to unauthorized individuals; neither does the company use CPNI in violation of § 64.2001 *et seq.* of the FCC's Rules.

Internap Connectivity does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases broadband services, Internap Connectivity takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

To the extent CPNI exists, it is maintained by Internap Connectivity in a secure location which is not accessible by company employees without the using established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

Moreover, any information constituting CPNI obtained by Internap Connectivity is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes. In the event of unauthorized CPNI access, Internap Connectivity will notify the requisite law enforcement agencies, and the customer when possible.

Internap Connectivity did not have any breach of its customer records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Internap Connectivity does not provide telecommunication services, and does not know the identity of end-users whose Internet traffic is routed through Internap Connectivity, it cannot notify any end-user customers directly if a breach occurs. However, Internap Connectivity has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

**Internap Connectivity, LLC**

**Annual CPNI Certification  
47 C.F.R. § 64.2009(e)  
EB Docket No. 06-36**

COMPANY NAME: Internap Connectivity, LLC

REPORTING PERIOD: January 1, 2017 - December 31, 2017

FILER ID: 829569

OFFICER: Robert Dennerlein

TITLE: Chief Financial Officer

I, Robert Dennerlein, hereby certify that I am an officer of Internap Connectivity, LLC ("Internap Connectivity") and that I am authorized to make this certification on behalf of Internap Connectivity. I have personal knowledge that Internap Connectivity has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Internap Connectivity or its broadband services, or to any of the information obtained by Internap Connectivity. See 47 C.F.R. § 64.2001 *et seq.* ("CPNI Rules").

Attached to this certification is an accompanying statement explaining the procedures Internap Connectivity employs to ensure that it complies with the Commission's CPNI Rules, to the extent that such requirements apply to Internap Connectivity or its broadband services, or to any of the information obtained by Internap Connectivity.

Signed: Robert Dennerlein

On behalf of Internap Connectivity, LLC

Date: Feb. 28, 2018